


RESPONSE TO REQUEST FOR INFORMATION

1. *Identify the state and date of incorporation of the Company and the Company's agents for service of process in the state of incorporation and in Puerto Rico.*

Response: The state of incorporation of Ramallo Bros. Printing, Inc. (hereinafter "Respondent") is Puerto Rico and the date of incorporation is December 22, 1965. The Respondent's agent for service of process, i.e. registered resident agent is Mr. Esteban Ramallo González, who is deceased and the certificate of incorporation has not been amended otherwise. Notwithstanding, the President of the corporation, Mr. Alberto Ramallo Yllanes, is authorized on behalf of the corporation to be serviced with any process.

2. *If Angel Ramallo Díaz is not the Chief Executive Officer or other presiding officer of the Company, please identify such person. Please also confirm the mailing address of the officer.*



Response: Mr. Angel Ramallo Díaz is not the Chief Executive Officer and does not an officer of Respondent. The President of Respondent is Mr. Alberto Ramallo Yllanes and his mailing address is: P.O. Box 70225, San Juan, PR 00936.


3. *What is the nature of the business conducted by the Company?*

Response: The nature of the business is commercial printing.

4. *If the Company is a subsidiary or affiliate or another corporation or other entity, identify each of those other entities and those entities' Chief Executive Officers or other presiding officers. Identify the state of incorporation and agents for service of process in the state of incorporation and in Puerto Rico for each entity identified in your response to this question.*

Response: The Respondent is not a subsidiary or affiliate of another corporation.


5. *Please describe in detail the manufacturing processes and any other operations conducted at the Ramallo Facility by the Company or any other company operating at the Ramallo Facility and identify the years in which each such company conducted such operations there. If those operations were not constant throughout such operations, describe the nature of all changes in operations and state the year of each change. As part of your answer to this question, also identify the types of materials (including hazardous substances) used, the products manufactured, and what hazardous wastes or industrial wastes were generated during and after the manufacturing process. In addition, please describe how and where all wastes have been disposed or throughout the period of operations.*




Response: Respondent has never conducted any manufacturing process or any other operation at the Ramallo Facility, as this term is defined in the “Instructions for Responding to the Request for Information”, which to the best of our knowledge and belief, is the facility located on “A” Street, off of State Road PR-171, in the Cidra Industrial Park, Cidra, Puerto Rico. As a matter of clarification, the definition of “Ramallo Facility” contained in the mentioned instructions is not correct in as much as it states that Respondent formerly operated that facility, since the fact is that Respondent never operated at that facility. As a matter of fact, Respondent has never operated at any facility located at Cidra, Puerto Rico. Respondent is the present owner of a property located at the mentioned address in Cidra, Puerto Rico in which it has never operated and which is only a real estate asset.

In order to expand on information that may clarify this matter, Respondent has contacted Mr. Angel Ramallo Díaz, former corporate secretary and stockholder of Ramallo Escribano, Inc. and Mr. Carlos Escribano Miró, former President and

also stockholder of Ramallo Escribano, Inc., who have assisted in the preparation of this response. The information provided by Mr. Angel Ramallo has been limited to his identification of documents and business transactions related to the real estate property and the information provided by Mr. Carlos Escribano has added a description of the manufacturing activities conducted at said property. Based on the knowledge obtained from these people, the following additional information is provided:

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- In August 25, 1986 Ramallo Escribano, Inc., a Puerto Rico corporation purchased the property located at Lot #3, Cidra Industrial Subdivision, Cidra, Puerto Rico from Linear Packaging, Inc., a Delaware corporation. Enclosed as Exhibit I is a copy of the purchase and sale deed. The property located at Lot #3 of the Cidra Industrial Subdivision in Cidra, Puerto Rico will be referred hereinafter as the "Cidra Property".
 - Ramallo Escribano, Inc. was a private corporation whose stockholders were Mr. Esteban Ramallo González (30%), Mr. Angel Ramallo Díaz (30%) and Mr. Carlos Escribano Miró (40%). Enclosed as Exhibit II is an application for tax exemption and a document titled "Location and Environmental Questionnaire" (in Spanish) which includes a description of the flexographic labels manufacturing operation.
 - To the best of our knowledge and belief, Linear Packaging, Inc. was or is a subsidiary or an affiliate of Sonoco International, Inc. which purchased it and changed the name from Lineal Products to Linear Packaging, Inc.


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- To the best of our knowledge and belief, a previous electronics manufacturing plant had built the structure at the property and initiated operations approximately in 1975 or 1976, before it was sold to Linear Packaging, Inc.
 - Ramallo Escribano, Inc. operated at the Cidra Property from September 1986 until August 1990 when it was sold to Respondent. Enclosed as Exhibit III is a copy of the purchase and sale deed between these two companies.
 - After the purchase and sale transaction of the Cidra Property, Ramallo Escribano, Inc. ceased operations and the stocks were sold to Ramallo, Escribano & Co., which was a commercial partnership formed by R & E Corporation and Engraph Puerto Rico, Inc. This sale included all the equipment and machinery.
 - Respondent never occupied nor operated the Cidra Property. After the Cidra Property was purchased by Respondent on August 1990, it was vacant until approximately September 1991. On or about that period of time, the Cidra Property was leased to Cidra Convention Center, Inc. a Puerto Rican corporation. Enclosed as Exhibit IV is a copy of a draft purchase and sale deed that was never signed, but this new company was allowed by Respondent to occupy and remodel the Cidra Property until the deed was finally negotiated and executed. However, the deed was never finalized but Cidra Convention Center, Inc. remodeled and operated the Cidra Property. There is documentation that indicate that a major

overhaul was completed by November 1995. Enclosed as Exhibit V are photos of the Cidra Property, promotion documents of the convention center and even pictures of activities held at the site.

- Cidra Convention Center, Inc. never paid any rent for the Cidra Property and was eventually evicted. The property has remained vacant and no other operations have been conducted at that site.

6. *Identify all leaks, spills, discharges or releases into the environment of any hazardous substances, hazardous wastes, industrial wastes, pollutants, or contaminants at or from the Ramallo Facility or from any other location within the Cidra Industrial Park. In responding to this question, please provide the following information:*

- a When such releases occurred;*
- b How the releases occurred;*
- c The amount of each hazardous substance, waste, industrial waste, pollutant, or contamination released;*
- d Where such releases occurred;*
- e Any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;*
- f Any and all investigations of the nature, extent or location of each release or threatened release including the results of any soil, water (ground and surface), or air testing undertaken; and*
- g All persons with information relating to these releases.*




Response: As a matter of clarification, the definition of "Ramallo Facility" contained in the mentioned instructions is not correct since Respondent (Ramallo Bros Printing, Inc.) never conducted any operation at the Cidra Property. Respondent does not know of the occurrence of any leaks, spills, discharges or releases into the environment of any hazardous substances, hazardous wastes,

industrial wastes, pollutants, or contaminants at or from the Cidra Property or from any other location within the Cidra Industrial Park. In responding to this question, Respondent has reviewed the documents that have been included as exhibits to these responses, and interviewed Mr. Carlos Escribano Miró, who has knowledge of the manufacturing activities conducted at this site.

7. *If the Company is the current owner, when did the Company acquire the Ramallo Facility? Please provide copies of all relevant deeds demonstrating such ownership. If the Company is not the current owner; please identify the current owner, the date of acquisition, and provide copies of deeds demonstrating current ownership, if available.*

Response: Again, the term "Ramallo Facility" is not defined correctly in the instructions since Respondent never conducted any operation at the Cidra Property. Respondent is the current owner and it acquired the Cidra Property in August 27, 1990. Enclosed as Exhibit III is a copy of the purchase and sale deed.

8. *Has the Company ever leased the Ramallo Facility to any other entity? If so, please provide copies of such leases relating to the Ramallo Facility.*




Response: Again the term "Ramallo Facility" is not defined correctly in the instructions since Respondent never conducted any operation at the Cidra Property. Respondent leased the Cidra Property to Cidra Convention Center, Inc. a Puerto Rican corporation. There was never a lease agreement formalized between the two companies. However, the tenant was allowed to occupy and remodel the property because negotiations were ongoing to sell it the property. A purchase and sale deed was drafted, copy of which is included as Exhibit IV, but was never executed and the tenant continued occupying and operating the site,

without paying the rent. As a matter of fact, it never paid any rent and had to be evicted.

9. *Did the Company have any operating permits, or RCRA I.D. number(s) related to the Ramallo Facility? If so, please provide copies of all such permits and RCRA I.D. numbers.*

Response: Again the term "Ramallo Facility" is not defined correctly in the instructions since Respondent never conducted any operation at the Cidra Property. Respondent did not have any operating permits because it never operated at the Cidra Property. Regarding the Ramallo Escribano, Inc. operations at the Cidra Property the application for tax exemption included in Exhibit II provides a description of the operation and makes no reference to the generation of hazardous wastes under RCRA.

10. *Please provide a copy of all insurance policies and indemnification agreements held or entered into by you and your Company which arguably could indemnify them against any liability which they may be found to have under CERCLA for releases of hazardous substances at and from the Site. In response to this request, please provide not only those insurance policies and agreements which currently are in effect, but also those which were in effect during the period(s) when any hazardous substances, hazardous wastes and/or industrial wastes may have been released or threatened to be released into the environment at or from the Ramallo Facility.*




Response: Respondent does not have insurance policies and/or indemnification agreements held or entered into, which arguably could indemnify Respondent against any liability which it may be found to have under CERCLA for releases of hazardous substances at and from the Cidra Property. This is the current situation and the situation that was in effect ever since Respondent acquired the Cidra Property in August 27, 1990.

11. *Has your Company been the subject of or otherwise involved in a bankruptcy filing under the United States Bankruptcy Code, 11 U.S.C. §§ 101-1330? If not, does your Company anticipate filing a petition under the Bankruptcy Code within the next six months? If the Company has been the subject of or otherwise involved in a bankruptcy filing, state when the case was filed, identify the name of the debtor(s) and the chapter of the Bankruptcy Code under which the bankruptcy was filed, and provide copies of all bankruptcy petition(s) and schedules which have been filed by or with respect to the Company. In addition, state the current status of the bankruptcy proceedings.*

Response: Respondent has not been the subject of or otherwise involved in a bankruptcy filing under the United States Bankruptcy Code, 11 U.S.C. §§ 101-1330. Respondent does not anticipate filing a petition under the Bankruptcy Code within the next six months.

12. *Do you have any additional information or documents which may help EPA identify other individuals or companies which owned or operated the Ramallo Facility, any other facility in the Cidra Industrial Park or in Cidra generally, at the time of disposal of any hazardous substances or who arranged for the treatment, or disposal of hazardous substances, hazardous wastes or industrial wastes at the Site? If so, please provide that information and those documents, and identify the source(s) of your information.*

Response: Again the term "Ramallo Facility" is not defined correctly in the instructions since Respondent never conducted any operation at the Cidra Property. Respondent has included the documents that are believed to help EPA know and better understand the operations that have been conducted at the Cidra Property.




To our best knowledge, other companies that operated in the Cidra area include Caribe Converter which was a label manufacturing plant, Pepsi Bottling Co., Caribbean Refrescos Co. which we believe is a subsidiary of The Coca Cola Company and Enco Manufacturing, Inc. which is a paint manufacturing plant.

We do not have knowledge about who arranged for the treatment or disposal of hazardous substances, hazardous wastes or industrial wastes from any of these companies and we do not have information about their present status or if they still exist.

Based on information provided by Mr. Carlos Escribano, during the period that he was at the Cidra Property an investigation was conducted by the Puerto Rico Environmental Quality Board (EQB) or some other agency dealing with environmental matters, and during the investigation he was visited. The investigators opened a manhole cover on the sidewalk next to the Cidra Property and informed Mr. Escribano that there was nothing wrong. After inquiring about the reason for reaching such a conclusion, they informed him that there were cockroaches in the manhole which was an indication that there were no chemicals or toxics substances present. That was the end of the investigation as far as Mr. Escribano understood and he never received any other investigation.

13. *Identify each person answering this Request for Information and state whether such person has personal knowledge of the answers. In addition, identify each person who assisted or was consulted in the preparation of the response to this Request for Information.*



Response: The person answering this request is Alberto Ramallo Yllanes, who is the President of Ramallo Bros. Printing, Inc., the Respondent to this Request for Information. He has personal knowledge about the fact that Respondent has not conducted any operations at the Cidra Property. Mr. Alberto Ramallo Yllanes does not have personal knowledge about manufacturing operations conducted at the site or business transactions related thereto, but has relied on the documents

that have been found regarding this property, which are believed to be true and had been prepared by lawyers dealing with the business transactions regarding this property. Therefore, there is no reason to believe that these documents are not true.

The rest of the knowledge regarding the information requested has been the result of the review of the documents that are enclosed as exhibits to these responses and interviews of Mr. Angel Ramallo Díaz and Mr. Carlos Escribano Miró. The information provided by Mr. Angel Ramallo Díaz is limited to his knowledge of the documents and business transactions regarding the Cidra Property and the information provided by Mr. Carlos Escribano includes his knowledge of the manufacturing operations conducted at the Cidra Property, plus the business transactions related thereto.

A handwritten signature in dark ink, appearing to be the initials 'AR' or a similar stylized mark.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of Puerto Rico

County of San Juan

I certify under penalty of law that we have I have personally examined the documents that are being submitted herewith in this response to EPA's Request for Information and that I believe that these documents are true, accurate, complete and authentic, as they were found in our files and were prepared by lawyers dealing with transactions related hereto. I cannot attest as to the content of those documents since I do not have personal knowledge about the events contained therein, but I can only attest to the fact that Respondent has never conducted any manufacturing operations at the Cidra Property, as defined herein. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

Alberto Ramallo Yllanes

NAME (print or type)

Alberto Ramallo

President

TITLE (print or type)

[Signature]

SIGNATURE

[Signature]
Affidavit No.: 415

Sworn to before me this 16 day of june, 2006



[Signature]

Notary Public